
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon. Leda Dunn Wettre
	:	
v.	:	Mag. No. 18-8267
	:	
DORINEL TROFIN and	:	
IONUT PARASCHIV	:	Criminal Complaint


I, Michael Scimeca, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

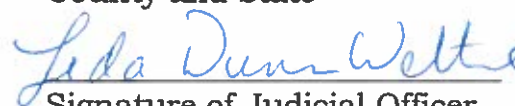


Michael Scimeca, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

December 12, 2018
Date

HONORABLE LEDA DUNN WETTRE
UNITED STATES MAGISTRATE JUDGE

at Essex County, New Jersey
County and State

Signature of Judicial Officer

ATTACHMENT A

**Count 1
(Bank Fraud)**

From at least as early as in or around July 2018 through in or around December 2018, in the District of New Jersey and elsewhere, the defendant,

DORINEL TROFIN,

did knowingly execute and attempt to execute a scheme and artifice to defraud a financial institution, as defined in Title 18, United States Code, Section 20, whose deposits were insured by the Federal Deposit Insurance Corporation or the National Credit Union Share Insurance Fund, and to obtain money, funds, credits, assets, securities, and other property owned by, and under the custody and control of such financial institution, by means of false and fraudulent pretenses, representations, and promises.

In violation of Title 18, United States Code, Section 1344.

**Count 2
(Bank Fraud)**

From at least as early as in or around June 2018 through in or around December 2018, in the District of New Jersey and elsewhere, the defendant,

IONUT PARASCHIV,

did knowingly execute and attempt to execute a scheme and artifice to defraud a financial institution, as defined in Title 18, United States Code, Section 20, whose deposits were insured by the Federal Deposit Insurance Corporation or the National Credit Union Share Insurance Fund, and to obtain money, funds, credits, assets, securities, and other property owned by, and under the custody and control of such financial institution, by means of false and fraudulent pretenses, representations, and promises.

In violation of Title 18, United States Code, Section 1344.

ATTACHMENT B

I, Michael Scimeca, am a Special Agent with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and evidence. Where statements of others are related herein, they are related in substance and part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

Background

1. At all times relevant to this Complaint, Dorinel Trofin ("Trofin") was a resident of Brooklyn, New York.

2. From in or around June 2018 to in or around October 2018, Ionut Paraschiv ("Paraschiv") was a resident of Brooklyn, New York. From in or around October 2018 to the present, Paraschiv was a resident of Fairview, New Jersey.

3. Law enforcement has been investigating the theft of banking and credit card information that is obtained through the use of equipment that is covertly and unlawfully affixed to Automated Teller Machines ("ATMs") and ATM vestibules that records unwitting customers' banking data. This type of illegal conduct is often referred to as "ATM skimming."

4. Individuals engaged in ATM skimming typically install electronic devices capable of recording bank customer information encoded on credit and debit cards ("Skimming Devices"), either on or in the ATMs themselves or on the card readers located next to ATM vestibule doors. In addition to installing Skimming Devices, individuals engaged in ATM skimming regularly install pinhole cameras on or around bank ATMs in order to record the keystrokes of bank customers as they enter the Personal Identification Numbers ("PINs") during ATM transactions.

5. Once they obtain the stolen card data, individuals engaged in ATM skimming transfer the stolen card data to counterfeit bank cards and use those counterfeit bank cards and the associated customer PINs to withdraw money from customer bank accounts. The use of the counterfeit bank cards to obtain money from stolen bank accounts is more commonly referred to as "cash-outs."

6. ATM skimming schemes generally involve the installation and subsequent removal of Skimming Devices and pinhole cameras (collectively, "Skimming Equipment"), the transfer of the stolen card data to counterfeit bank cards, and the use of the counterfeit bank cards at ATMs to conduct fraudulent transactions, in which they steal money from customer's bank accounts.

ATM Skimming Scheme

7. In this ATM skimming scheme, defendant Trofin and defendant Paraschiv installed Skimming Devices at various hotels and other locations that were located in popular tourist areas in New York and New Jersey. Trofin and Paraschiv then used counterfeit ATM cards encoded with stolen bank account information to withdraw money from the compromised accounts. Sometimes a group would conduct the cash-outs at the same ATM location or locations in close succession to one another, while other times, cash-outs were conducted by one individual.

8. On or about July 13, 2018, an ATM Skimming Device was discovered at the Park Lane Hotel in Manhattan. Surveillance footage places Trofin at the ATM where the Skimming Device was located shortly before the Skimming Device was discovered, capturing his face and upper body. The footage shows Trofin at the ATM for an unusually long period of time. The footage also shows Trofin's upper body moving in a way that is inconsistent with a simple ATM transaction, instead appearing to manipulate the ATM. Surveillance footage shows Trofin exiting the area and travelling to his vehicle before leaving the area. Data recovered from law enforcement license plate readers ("License Plate Readers") places Trofin's vehicle in the vicinity of the Park Lane Hotel at the time of the installation.

9. On or about August 17, 2018, surveillance cameras captured Trofin conducting multiple ATM transactions and cashing-out an ATM at the Monroe Township branch of Provident Bank in Middlesex County, New Jersey. Provident Bank confirmed that the transactions shown in the surveillance footage were fraudulent. A License Plate Reader captured Trofin's vehicle parked approximately two blocks away from the bank at the time of these cash-outs.

10. On or about October 13, 2018, surveillance cameras captured Trofin conducting multiple ATM transactions and cashing-out an ATM at the Madison branch of Provident Bank in Morris County, New Jersey. Provident Bank confirmed that the transactions shown in the surveillance footage were fraudulent.

11. On or about October 31, 2018, surveillance cameras captured Trofin at an ATM located at a Duane Reade drug store in Manhattan shortly before a Skimming Device was discovered on the ATM and reported to law enforcement. The Skimming Device contained a pinhole camera to capture unsuspecting ATM-user's key strokes as they input their PIN. The surveillance footage shows Trofin standing at the ATM for an unusually long period of time. The footage also shows Trofin appearing to manipulate the ATM in a manner that is inconsistent with a typical ATM transaction. Court-authorized GPS tracking data for a vehicle known to be used by Trofin shows that Trofin's vehicle was in the vicinity of the Duane

Reade drug store at the time the Skimming Device was discovered around 10:00 a.m.

12. On or about November 7, 2018, surveillance cameras captured Trofin conducting multiple ATM transactions and cashing-out an ATM at the Red Bank branch of Investor's Bank, in Monmouth County, New Jersey. Investor's Bank has confirmed that these transactions were fraudulent. Court-authorized GPS tracking data for a vehicle known to be used by Trofin shows that Trofin's vehicle was in the vicinity of the Red Bank branch of Investor's Bank at the time of the fraudulent ATM transactions.

13. On or about December 8, 2018, surveillance cameras captured Trofin conducting multiple ATM transactions and cashing-out an ATM at the Penn Eastern Federal Credit Union in Clark's Summit, Pennsylvania. Penn Eastern Federal Credit Union has confirmed that these transactions were fraudulent. Court-authorized GPS tracking data for a vehicle known to be used by Trofin shows that Trofin's vehicle was in the vicinity of the credit union at the time of the incident.

14. On or about June 13, 2018, surveillance cameras captured Paraschiv conducting multiple ATM transactions and cashing-out ATMs at the Bloomfield and Belleville branches of Provident Bank, in Essex County, New Jersey. Provident Bank confirmed that the transactions Paraschiv conducted at the Bloomfield and Belleville branches on this date were fraudulent. EZ-Pass data shows a vehicle known to be used by Paraschiv entering and exiting the New Jersey Turnpike at times that corroborate his involvement in these cash-outs.

15. On or about June 16, 2018, surveillance cameras captured Paraschiv conducting approximately fifty-eight ATM transactions at Provident Bank branches throughout Middlesex County, New Jersey, including branches located in: Edison, Highland Park, Perth Amboy, Piscataway, Matawan, Old Bridge, Iselin, and Metuchen. Provident Bank has confirmed that these fifty-eight transactions were fraudulent. EZ-Pass toll data also corroborates Paraschiv's involvement in these cash-outs.

16. On or about October 9, 2018, surveillance cameras captured Paraschiv cashing-out an ATM at the Paterson branch of the Greater Alliance Federal Credit Union ("GAFCU") in Passaic County, New Jersey. On the same date, surveillance cameras captured Paraschiv cashing-out an ATM at the Hackensack branch of the GAFCU, in Bergen County, New Jersey. The GAFCU has confirmed that the transactions at both branches were fraudulent.

17. On or about October 16, 2018, surveillance cameras captured Paraschiv installing a Skimming Device on an ATM at the AC Hotel by Marriot – New York Times Square, in Manhattan. The surveillance footage shows Paraschiv

standing at the ATM for an unusually long period of time. The security footage also shows Paraschiv appearing to manipulate the ATM in a manner that is inconsistent with a typical ATM transaction. Court-authorized GPS tracking data for a vehicle known to be used by Paraschiv shows that Paraschiv's vehicle was in the near vicinity of the AC Hotel at the time of this incident.

18. On or about October 22, 2018, surveillance cameras captured Paraschiv conducting multiple ATM transactions and cashing-out an ATM located at the Paramus branch of the GAFCU, in Bergen County, New Jersey. The GAFCU has confirmed that these transactions were fraudulent. Court-authorized GPS tracking data for a vehicle known to be used by Paraschiv shows that Paraschiv's vehicle was in the vicinity of the Paramus branch of the GAFCU at the time of this incident.

19. During all times relevant to this Complaint, Provident Bank and Investor's Bank were both insured by the Federal Deposit Insurance Corporation ("FDIC"). The Penn Eastern Federal Credit Union and Greater Alliance Federal Credit Union are members of the National Credit Union Administration ("NCUA"). The NCUA operates and manages the National Credit Union Share Insurance Fund, which provides federal insurance to credit unions, similar to the FDIC. As such, Provident Bank, Investor's Bank, the Penn Eastern Federal Credit Union, and the Greater Alliance Federal Credit Union were federally insured financial institutions as that term is defined in 18 U.S.C. § 20.